## **REMARKS/ARGUMENTS**

Claims 1, 4, 5, 11 and 18-37 are pending in this application. By this Amendment, claims 1, 4, 5, 11 and 18-37 are amended. Support for the claims can be found throughout the specification, including the original claims, and the drawings. Withdrawal of the rejections in view of the above amendments and the following remarks is respectfully requested.

The Office Action rejects claims 1, 4, 5, 11 and 18-27 under 35 U.S.C. §103(a) over U.S. Patent No. 4,168,842 to Suzuki et al. (hereinafter "Suzuki") in view of Im et al., U.S. Patent Publication No. 2002/0067117 (hereinafter "Im") and U.S. Patent No. 4,168,450 to Yamauchi et al. (hereinafter "Yamauchi"). The rejection is respectfully traversed.

MPEP 2141.01(a) states:

"[I]n order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonable pertinent to the particular problem with which the inventor was concerned."

It is respectfully submitted that Suzuki is non-analagous art, and not properly applied in a rejection of the present application. That is, Suzuki discloses a shadow mask 25 for use with a color cathode ray tube (CRT). It is well known in the art that this type of shadow mask 25 is typically positioned adjacent a front panel of the CRT, and the apertures 31 in the shadow mask 25 direct beams therethrough and onto a coated portion of the panel so as to generate a desired image. This type of shadow mask 25 for a CRT must be maintained in its position adjacent the front panel for the proper functionality of the CRT throughout its operational life. It is well

known in the art that the type of shadow mask 25 disclosed by Suzuki is <u>not</u> used in an organic electroluminescent device as set forth in the specification of the present application.

Rather, the invention as set forth in the specification is directed at masks which are used during deposition of a luminescent material to block adjacent deposition areas, or adjacent subpixels, during fabrication (see paragraphs 32-38 and Figures 4A-4F of the present application). In particular, once the pixel electrodes 48 have been formed atop the insulating layer 46 and extending into the vias 47, and the insulating boundaries 49 have been formed between adjacent pixels, a mask 170 is superposed on this structure to expose only portion(s) of the pixel electrode 48 to be coated with an organic electroluminescent layer 50, for example, by blocking adjacent areas (see in particular Figure 4E of the present application). After the organic electroluminescent layer 50 is deposited, the mask 170 is removed and a common electrode 51 is formed atop the structure to complete fabrication. Different embodiments of masks which may be used during deposition of the electroluminescent material are shown in Figures 5, 7 and 8 of the present application.

These masks function to block adjacent deposition areas during deposition of the organic electroluminescent layer 50, and may, for example, direct the deposited material in a manner so as to improve deposition characteristics, such as, for example, avoiding "dead areas" in the pixels. The masks are then removed prior to completion of the panel structure. It would be well understood by one of ordinary skill in the art that these masks are in no way comparable to a shadow mask such as the shadow mask 25 disclosed by Suzuki, which is specifically designed to

be left in place during operation of a CRT so as to direct beams onto the panel as required, and that a shadow mask 25 as disclosed by Suzuki would have no place in an electroluminescent device as discussed in the specification.

It is respectfully submitted that Suzuki, and particularly the shadow mask 25 disclosed by Suzuki, is in a different field of endeavor that that the masks set forth in the specification of the present application, and that the shadow mask 25 disclosed by Suzuki is not reasonably pertinent to solving the various issues set forth in the specification. Accordingly, it is respectfully submitted that Suzuki is non-analogous art, and is thus not properly applied in a rejection of the present application.

Further, Im and Yamauchi each fail to overcome the deficiencies of Suzuki. More specifically, Im and Yamauchi each suffer deficiencies similar to those set forth above with respect to Suzuki, in that Im and Yamauchi each disclose shadow masks used with a CRT to direct beams generated by an electron gun onto an adjacent panel to produce a desired image.

For at least these reasons, it is respectfully submitted that independent claims 1, 4, 5, 11 and 18-27 are allowable over Suzuki, Im and Yamauchi, either alone or in combination, and thus the rejection of independent claims 1, 4, 5, 11 and 18-27 under 35 U.S.C. §103(a) over Suzuki, Im and Yamauchi should be withdrawn.

The Office Action rejects claims 29-33, 35 and 36 under 35 U.S.C. §103(a) over Suzuki and Yamauchi in view of U.S. Patent No. 6,485,884 to Wolk et al. (hereinafter "Wolk"). The rejection is respectfully traversed.

As set forth above, Suzuki and Yamauchi are non-analagous art, and are thus not properly applied in a rejection of the present application. Further, Wolk is merely cited as allegedly teaching slot alignment, and thus fails to overcome the deficiencies of Suzuki and Yamauchi. Accordingly, it is respectfully submitted that claims 29-33, 35 and 36 are allowable over the applied combination, and thus the rejection of claims 29-33, 35 and 36 under 35 U.S.C. §103(a) over Suzuki, Yamauchi and Wolk should be withdrawn.

The Office Action rejects claims 28, 34 and 37 under 35 U.S.C. §103(a) over Suzuki and Im, or alternatively, over Suzuki, Yamauchi and Wolk in view of Korean Patent Publication No. 2001 087952 (hereinafter "KR '952"). These rejections are respectfully traversed.

Dependent claims 28, 34 and 37 are allowable over Suzuki, Im, Yamauchi, and Wolk, either alone or in combination, at least for the reasons set forth above with respect to independent claims 1, 11 and 29, from which they respectively depend, as well as for their added features. Further, KR '952 is merely cited as allegedly teaching shapes of strip type slots, and thus fails to overcome the deficiencies of Suzuki, Im, Yamauchi and Wolk. Accordingly, it is respectfully submitted that the rejection of claims 28, 34 and 37 under 35 U.S.C. §103(a) over Suzuki and Im, and over Suzuki, Yamauchi, Wolk and KR '952 should be withdrawn.

## **CONCLUSION**

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes

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would place the application in better condition for allowance, the Examiner is invited to contact the undersigned, **JOANNA K. MASON**, at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted, FLESHNER & KIM, LLP

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